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February 6, 2024

**BY ECF and Email (ALCarterNYSDChambers@nysd.uscourts.gov)**

Honorable Andrew L. Carter, Jr.  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Rm 435  
New York, New York 10007

Re: Dowdy, et al. v. City of New York  
Docket No. 22-CV-6284 (ALC)

Dear Judge Carter:

I am an Assistant Corporation Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendant City of New York in the above-referenced action. Pursuant to Section 1.D of Your Honor's Individual Rules, I write to request that Defendant's deadline to submit its motion to dismiss the Second Amended Complaint be extended from February 8, 2024 to March 8, 2024. This is Defendant's first request for an extension of time to respond to the Second Amended Complaint.

This extension is necessary due to an influx of cases in my office, and the resultant strain on the availability of counsel to prepare and review a response to the Second Amended Complaint prior to the original filing deadline. Plaintiffs consent to this request.

Accordingly Defendant respectfully requests that its deadline to submit its motion to dismiss the Second Amended Complaint be extended from February 8, 2024 to March 8, 2024, and that the Court endorse the following proposed briefing schedule:

Defendant's Motion:	March 8, 2024
Plaintiff's Opposition:	April 19, 2024
Defendant's Reply:	May 10, 2024

Respectfully Submitted,

*/s/ Talysia Francis*  
Talysia Francis  
Assistant Corporation Counsel

cc: Phillip H. Seelig, Esq. (via ECF)  
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